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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2010

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Name of company covered by this certification: Digital Agent, LLC

Form 499 Filer ID: 822632

Name of signatory: David C. Hunter

Title of signatory: Vice President of Operations

I, David C. Hunter, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

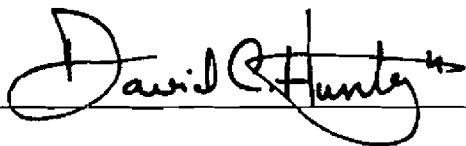
See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



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Digital Agent CPNI Procedures

Digital Agent, LLC ("Digital Agent") has adopted and complies with the following operating procedures to protect the confidentiality of (1) information that relates to the quantity, technical configuration, type, destination, location, or amount of use of the telecommunications services to which its customers subscribe and (2) information contained in bills pertaining to telecommunications services that it provides to its customers (collectively, "Customer Proprietary Network Information" or "CPNI") and to ensure that Digital Agent complies with the Federal Communications Commission's CPNI rules:

- Digital Agent stores all CPNI on a secure computer network that is not accessible from the Internet and is located in a physically secured environment.
- Digital Agent requires all employees, vendors and contractors who have any access to CPNI to execute confidentiality and non-disclosure agreements that prohibit them from disclosing CPNI to third parties or using CPNI for marketing purposes except in strict conformity to these policies.
- Digital Agent does not disclose any CPNI to any third party for any marketing purpose.
- Digital Agent uses CPNI without customer consent as necessary in order (1) to provide the telecommunications service from which such information is derived, (2) to initiate, render, bill, and collect for such telecommunications services, and (3) to protect the rights or property of Digital Agent, or to protect users of Digital Agent's services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- Except as provided in the immediately preceding paragraph, Digital Agent does not release any CPNI to third parties for any purpose except in response to legal process.
- Digital Agent does not release any customer's CPNI to that customer except after positive confirmation of the customer's identity.
- Digital Agent does not use any CPNI without customer consent to market products or services other than (1) the specific categories of telecommunications services that Digital Agent provides at the time of such use to the customer whose CPNI is used for such purpose and (2) services formerly known as adjunct-to-basic, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and centrex features.
- Digital Agent may use CPNI only with customer consent (either "opt-in" or "opt-out") to market (1) telecommunications services that Digital Agent does not provide at the time of such use to the customer whose CPNI is used for such purpose and (2) other communications-related services.

- Approval or disapproval for Digital Agent to use, disclose, or permit access to a customer's CPNI remains in effect until the customer revokes or limits such approval or disapproval. Digital Agent maintains records of approval for at least one (1) year.
- Digital Agent solicits customer consent to the use or disclosure of CPNI only in conjunction with notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI that provides sufficient information to enable the customer to make an informed decision as to whether to permit Digital Agent to use, disclose, or permit access to the customer's CPNI. Digital Agent maintains records of such notification for at least one (1) year,
- All Digital Agent sales and marketing campaigns that use CPNI, including all "outbound marketing campaigns," require advance supervisory approval. Evidence of this approval, together with a record for each campaign that uses CPNI, is maintained for a minimum of one (1) year following completion of the campaign.
- Digital Agent provides periodic training to its employees concerning the importance of maintaining the confidentiality of its customers' CPNI and the required procedures for ensuring compliance with the CPNI rules.
- Digital Agent employees are subject to disciplinary action, including termination in appropriate cases, for violations of Digital Agent's CPNI confidentiality policy.
- Any use or release of any CPNI by any Digital Agent employee to any person other than a customer whose identity has been confirmed requires the approval of a supervisor who is knowledgeable concerning Digital Agent's CPNI policies and the requirements of the CPNI rules.
- Digital Agent requires all customers to use a password to access any CPNI. All passwords are encrypted and protected from any outside or inside attack.
- Digital Agent requires each customer to identify himself or herself to an employee of Digital Agent using information previously provided by the customer, such as the answer to a secret question, in order to reset a forgotten password. Digital Agent does not reset passwords based upon readily available biographical information or account information.
- Digital Agent keeps logs of all transactions that impact CPNI either by the customer directly using a Digital Agent portal or by a Digital Agent employee.